

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

Cr. No. 04-1809- CBS

JOSEPH BALDASSANO

PROPOSED CONDITIONS FO RELEASE

Defendant Joseph Baldassano, by his attorney, proposes the following conditions of pre-trial release be ordered.

CONTEXT FOR PROPOSED CONDITIONS OF RELEASE:

Mr. Baldassano is charged in the above captioned complaint with, in substance, conspiracy and distribution of oxycodone in violation of 21 U.S.C. §841(a)(1) and 846.

Mr. Baldassano, age 23, was raised in Gloucester, Massachusetts by his parents Antonino Baldassano and Ignazia Baldassano. Mr. and Mrs. Baldassano immigrated to this country from Italy, became citizens, worked hard, raised a family of three children, and purchased a home at 220 Washington Street, Gloucester, Massachusetts. The home has a present fair market value of \$560,000.00 encumbered by a first mortgage to Gloucester Cooperative Bank with a principle balance of \$157,000.00.

Joseph Baldassano grew up in the family home and graduated from Gloucester High School in 1999. Thereafter, he enrolled in Wentworth College to study computer science and completed the academic year. Mr. Baldassano changed his academic focus to marketing and management and transferred to the University of Massachusetts, Lowell to commence his second year of college. He has remained a full time student at UMass, Lowell but because certain credits were not accepted by UMass, he did not graduate this spring. One degree requirement is in foreign language. Mr. Baldassaro, who is fluent in

Italian, in enrolled in an Italian course which commences on July 12, 2004 and meets four days per week from 8:00 – 10:00 a.m. The course concludes in mid-August.

Mr. Baldassaro has most recently resided in an apartment at 40 Sarah Avenue, Lowell, Massachusetts. Mr. Baldassaro will be notifying his landlord that he does not intend to renew his tenancy.

Mr. Baldassaro is currently on probation as a result of his conviction in the Gloucester District Court in December, 2003, for possession of oxycodone. His probation is supervised by Lowell District Court Probation Officer Edward Quimby. When Mr. Baldassaro began probation supervision in late January, 2004, he informed his probation officer that he was using oxycodone and that he intended to initiate a program to cease his drug use. Mr. Baldassaro researched the issue of proper treatment and began treatment with Dr. Ezzatti, Framingham, Massachusetts which included detoxification and medication.. Since March, 2004, Mr. Baldassaro has been prescribed subutex and has remained drug free as confirmed by testing through the probation office and his physician. He has maintained bi-monthly appointments with his physician at which times he has been screened for any drug use and had his prescription medication renewed. The prescriptions have been written for approximately 15 days of use, thus requiring the frequency of doctor appointments.

PROPOSED CONDITIONS OF RELEASE:

1. Appearance bond secured by the equity in his parents home;
2. Maintain residence at 220 Washington Street, Gloucester, Massachusetts;
3. Attend and complete course now enrolled at UMass, Lowell;
4. Maintain drug treatment as required by pre-trial services office;

5. Obey all statutory and reporting conditions set by the Court and pre-trial services office.

ADDITIONAL CONDITIONS OF RELEASE:

In the event the Court concludes release is appropriate but more restrictive conditions of release are required, Mr. Baldassaro is prepared to be home detained with an electronic monitoring bracelet. If such be ordered, Mr. Baldassaro requests that he be permitted to attend the course at UMass, Lowell and that reasonable time for travel and class attendance be permitted.

CONCLUSION:

Mr. Baldassaro asks this Court to conclude that there are a combination of conditions of pretrial release which will both assure his appearance at all required court proceedings and the safety of the community.

JOSEPH BALDASSANO

By his attorney,



Elliot M. Weinstein

BBO #520400

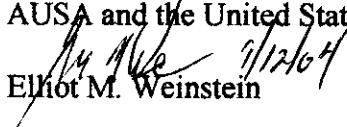
228 Lewis Wharf

Boston, MA 02110

617-367-9334

CERTIFICATE OF SERVICE

I certify that I have served a copy of the above on Michael Pelgro and/or David Tobin, AUSA and the United States Pretrial Services Office.

  
Elliot M. Weinstein

Jul-07-04 08:02am From-

T-377 P.02/02 F-848

BK6443 PG424

KNOW ALL MEN BY THESE PRESENTS, that I, HARRY RUBIN,  
 of Gloucester, Essex County, Massachusetts  
 in consideration of FIFTY-SEVEN THOUSAND (\$57,000.00) DOLLARS

grant to ~~ANTONIO BALDASSANO~~ <sup>ANTONIO</sup> BALDASSANO and IGNAZIA BALDASSANO, husband and  
 wife, as ~~tenants in common, both~~ joint tenants and not  
 tenants in common, both  
 of 220 Washington Street in said Gloucester, Essex County,  
 Massachusetts with quitclaim conveyance  
~~in consideration of~~

A certain parcel of land with the building thereon  
 situated on the corner of Washington Street and Gloucester  
 Avenue Extension in said Gloucester, being the Easterly half  
 of lot #5 as shown on plan of lots belonging to Frank Stanwood  
 of said Gloucester dated August 24, 1903 Winslow L. Webber,  
 C.E. recorded in the Essex South District Registry of Deeds  
 in Plan Book 14, Plan 1 and more particularly bounded and described  
 as follows:

Beginning at a point on the Westerly side of Washington  
 Street at the corner of a roadway now called Gloucester Avenue  
 Extension, as shown on said plan and running in a Northwesterly  
 direction by said Washington Street, sixty-one (61) feet to an  
 iron bolt and lot numbered six on said plan, now or formerly of  
 Gloport Investment Trust; thence turning and running in a South-  
 westerly direction by said lot six, one hundred (100) feet  
 to land now or formerly of Frank Groppe and Agatha Groppe; thence  
 turning and running in a Southeasterly direction by land of said  
 Groppe to a point in said roadway, sixty-one (61) feet; thence  
 turning and running in a Northeasterly direction by said roadway,  
 one hundred (100) feet to the point of beginning.

Being the same premises conveyed to the grantor hereof  
 by Oscar Rose by deed dated December 21, 1945 and recorded in  
 the Essex South District Registry of Deeds in Book 3435, Page 487

WITNESS my hand and seal this 15<sup>th</sup> day of February, 1947

*Harry Rubin*  
 HARRY RUBIN

The Commonwealth of Massachusetts

Essex, ss.

Gloucester February 15, 1947

Then personally appeared the above named

HARRY RUBIN

and acknowledged the foregoing instrument to be his free act and deed.

Before me,

My commission expires

ESSEX SS. RECORDED Feb 15, 1947 44 M. PAST 1 P.M. INST.



July 7, 2004

To Whom It May Concern:

Based upon an evaluation of the property known as 220 Washington Street in Gloucester, Massachusetts my opinion of value would be \$560,000.00. This opinion is based on current market trends and conditions and if necessary, should be reevaluated in 90 days.

Should you have any questions or if I can be of any further assistance, please feel free to contact me directly at 978-865-1160.

Sincerely,

A handwritten signature in black ink that reads "Maureen Johnson". The signature is fluid and cursive, with the first name "Maureen" and last name "Johnson" clearly distinguishable.

Maureen Johnson  
Broker/Owner  
RE/MAX Gallery

**Maureen Johnson**  
Broker/Owner

**RE/MAX Gallery REALTORS®**

1 Main Street at Rogers, Unit 2, Gloucester, Massachusetts 01930  
Office: (978) 281-8005, Fax: 281-7228

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Page: 1 of 2

**Billing Date: 06-30-2004**

**XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX**

ANTONINO BALDASSANO  
IGNAZIA A BALDASSANO  
220 WASHINGTON ST  
GLOUCESTER MA 01930-2253

Previous Principal Balance	Payments	Finance Charge	Advances	Other Charges	Ending Principal Balance
157,735.47	1,200.00	455.73	0.00	0.00	156,991.20

Payment Due Date	Principal	Finance Charge	Escrow	Late Charge	Other	Total
07-25-2004	0.00	534.56	0.00	0.00	0.00	534.56

Date	Description	Credits	Debits	Balance
05-29-2004	Starting Principal Balance			157,735.47
06-28-2004	Regular Payment - Note Interest	455.73		
	Principal Receipt	744.27		156,991.20

ANTONINO BALDASSANO  
IGNAZIA A BALDASSANO  
220 WASHINGTON ST  
GLOUCESTER MA 01930-2253

**Due Date:** 07-25-2004  
**PLEASE PAY:** \$534.56

**Escrow:**

**Principal:**

**Late Charges:** \_\_\_\_\_

Other (Explain) :

**Total Enclosed:** \_\_\_\_\_

1061